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Attorneys for Defendants Green United, LLC and Wright W. Thurston and Relief Defendants

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

GREEN UNITED, LLC, et al.,

Defendants.

**DEFENDANTS GREEN UNITED,
LLC, WRIGHT W. THURSTON, AND
RELIEF DEFENDANTS' MOTION
FOR LEAVE TO FILE AN
OVERLENGTH REPLY
MEMORANDUM IN SUPPORT OF
THEIR MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

Case No. 2:23-cv-00159-BSJ

Judge Bruce S. Jenkins

Defendants Green United, LLC (“Green United”) and Wright W. Thurston (“Thurston”) and Relief Defendants True North United Investments, LLC (“True North”) and Block Brothers, LLC (“Block Brothers”), through counsel of record, pursuant to DUCivR 7-1(a)(6)(A), request that the Court grant leave for the foregoing parties to jointly submit a single overlength Reply Memorandum in Support of their Motion to Dismiss the Complaint filed by Plaintiff Securities and Exchange Commission (“SEC”). Green United, Thurston and the Relief Defendants request up to an additional 7 pages (17 pages in total), for their Reply Memorandum in Support of their Motion to Dismiss (the “Motion”).

Green United, Thurston and the Relief Defendants have good cause for the need of the additional 7 pages. First, the SEC’s Memorandum in Opposition cites and relies on multiple cases without detailed analysis of those cases. In order to fully apprise the Court of the issues in the underlying Motion, additional pages are necessary to explain, discuss, and differentiate the cases cited by the SEC. Second, the Reply Memorandum is jointly filed by Green United and Thurston. Additional pages are necessary, and more favorable to separate memoranda for the Defendants, to address the separate issues and sections that are unique to Thurston.

Based on the foregoing, Green United, Thurston and the Relief Defendants request leave to file an overlength Motion with an additional 7 pages (17 pages in total). A proposed Order is filed concurrently herewith.

DATED this 28th day of July 2023.

PARSONS BEHLE AND LATIMER

/s/ Jonathan D. Bletzacker

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DAVIS WRIGHT TREMAINE, LLP

/s/ Stephen T. Gannon

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True North United Investment, LLC and Block
Brothers, LLC*

CERTIFICATE OF SERVICE

On this 28th day of July 2023, I hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification and service to all counsel of record.

/s/ Jonathan D. Bletzacker